

**GOVERNMENT OF PUERTO RICO
PUERTO RICO PUBLIC SERVICE REGULATORY BOARD
PUERTO RICO ENERGY BUREAU**

NEPR
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IN RE:

PLAN PRIORITARIO PARA LA
ESTABILIZACIÓN DE LA RED
ELÉCTRICA

CASE NO. NEPR-MI-2024-0005

SUBJECT: Submittal of Additional
Information Requested During Virtual
Technical Workshop of September 11, 2024

**MOTION SUBMITTING ADDITIONAL INFORMATION REQUESTED DURING
VIRTUAL TECHNICAL WORKSHOP OF SEPTEMBER 11, 2024**

TO THE PUERTO RICO ENERGY BUREAU:

COME NOW LUMA Energy ServCo, LLC and LUMA Energy, LLC (collectively “LUMA”) through their undersigned legal representatives and respectfully submit and request the following:

I. Relevant Procedural History and Background

1. On June 13, 2024, the Puerto Rico Energy Bureau of the Public Service Regulatory Board (“Energy Bureau”) issued a Resolution and Order (“June 13th Order”) initiating this proceeding and ordering LUMA, Genera PR, LLC (“Genera”) and the Puerto Rico Electric Power Authority (“PREPA”) to each develop and submit to the Energy Bureau an “aggressive preliminary plan of improvements to the electric system” (“Preliminary Plan”) with the information specified in the June 13th Order and having a maximum implementation period of two (2) years. *See* June 13th Order on pages 1-2.

2. On July 10, 2024, LUMA submitted to the Energy Bureau the Preliminary Plan in the form of a draft (“Preliminary Plan Draft”). *See Motion in Compliance with Order to Show Cause of July 5, 2024 and Submitting Preliminary Plan Draft Required by the Resolution and Order of June 13, 2024* (“July 10th Motion”) on pages 3, 8, 9 and 12.

3. On July 19, 2024, LUMA submitted an updated Preliminary Plan and requested the Energy Bureau to use it as the Preliminary Plan to be subject to evaluation in this proceeding, instead of the Preliminary Plan Draft. *See Motion Submitting Updated Preliminary Plan* on page 5 and Exhibit 1.

4. On August 9, 2024, the Energy Bureau issued a Resolution and Order (“August 9th Resolution and Order”) indicating that all parties (LUMA, Genera and PREPA) had submitted their Preliminary Plans and establishing a procedural calendar for the analysis of these Preliminary Plans. *See August 9th Resolution and Order* on pages 1-2. As part of this procedural calendar, the Energy Bureau scheduled a Virtual Technical Workshop with LUMA, Genera, PREPA and stakeholders for September 11, 2024, at 10:00 a.m., and, among others, directed LUMA, Genera and PREPA to “present and thoroughly discuss their Preliminary Plan” during the Virtual Technical Workshop. *See id.* at page 2. In the August 9th Resolution and Order, the Energy Bureau also established the deadlines of: September 9, 2024 for LUMA, Genera and PREPA to submit their Presentations for the Virtual Technical Workshop; September 25, 2024, to file any revised or additional information requested by the Energy Bureau; October 2, 2024, for a Virtual Public Hearing; and October 8, 2024 for the public to submit comments. *See id.*

5. On September 9, 2024, LUMA filed a *Motion Submitting LUMA’s Presentation for Virtual Technical Workshop Scheduled for September 11, 2024.*

6. On September 11, 2024, the Energy Bureau held the Virtual Technical Workshop during which each LUMA, Genera and PREPA made presentations about their Preliminary Plans and the Energy Bureau’s consultants and Commissioners, as well as stakeholders, asked questions on the subjects in the presentations, among others. In response to two inquiries by Energy Bureau consultants, LUMA indicated that it would verify some information to be provided- namely,

information on how many miles of distribution lines will be cleared of vegetation during the next two fiscal years as part of the Operations and the Vegetation Capital Clearing Programs and the specific amount of mobile generators that LUMA has available (“Additional Information”).

II. Submittal of Responses to the Additional Information Requested During the Virtual Technical Workshop

7. LUMA hereby submits, as *Exhibit 1*, the Additional Information in response to the questions from the Energy Bureau’s consultants during the Virtual Technical Workshop.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned and **accept** the Additional Information being provided herein as *Exhibit 1*, in response to the questions from the Energy Bureau’s consultants during the Virtual Technical Workshop of September 11, 2024.

RESPECTFULLY SUBMITTED.

We hereby certify that we filed this Motion using the electronic filing system of this Energy Bureau and we will send an electronic copy of this Motion to counsel for PREPA Alexis G. Rivera Medina, arivera@gmlex.net and mvalle@gmlex.net; counsel for Genera PR LLC, lrn@roman-negron.com, as well as regulatory@genera-pr.com and legal@genera-pr.com.

In San Juan, Puerto Rico, this 25th day of September 2024.



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Exhibit 1
Additional Information



System Improvements Plan

NEPR-MI-2024-0005

Responses to September 11, 2024, Requests

September 25, 2024

List of Responses and Attachments

Response ID	Document Type	Response Subject
ROI-LUMA-MI-2024-0005-20240911-PREB-0001	Response	Vegetation Distribution Miles
ROI-LUMA-MI-2024-0005-20240911-PREB-0002	Response	Available Mobile Generators

System Improvements Plan

NEPR-MI-2024-0005

Response: ROI-LUMA-MI-2024-0005-20240911-PREB-0001

SUBJECT

Vegetation Distribution Miles

REQUEST

How many Distribution miles will be cleared during the next two fiscal years in total between the Operations and the Vegetation Clearing programs?

RESPONSE

Projected Distribution Miles to be Cleared (Approximate)		
	FY2025	FY2026
Vegetation Capital Clearing Program	1,940+	2,380+
Operations	600+	650
Total Projected Distribution Miles	2,540+*	3,030+*

*Projected miles are based on the current FEMA obligation schedule, Environmental and Historic Preservation (EHP) requirements, contractor availability, work rate, weather and other considerations.

System Improvements Plan

NEPR-MI-2024-0005

Response: ROI-LUMA-MI-2024-0005-20240911-PREB-0002

SUBJECT

Available Mobile Generators

REQUEST

How many mobile generators does LUMA have available?

RESPONSE

LUMA has within its fleet, five trailer mounted mobile generators that vary in size from 125 kW to 300 kW. These generators are used to support LUMA's maintenance and construction activities and are of insufficient size and configuration to be able to provide grid support during emergency events.

LUMA is in the process of establishing a prepositioned contract(s) with one or more vendors to provide, on a leased basis, mobile diesel generators that are in the size range of 1500 kW to 2000 kW. The vendors would be expected to supply these generators through emergency rapid mobilization to support LUMA with restoration activities during emergency events, including Federally declared emergencies and disasters.